

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

**CUSTOMS & INTERNATIONAL
TRADE NEWSLETTER
3520 Crystal View Court
Miami, Florida 33133,**

Plaintiff,

v.

Civil Action No.

**U. S. CUSTOMS AND
BORDER PROTECTION
1300 Pennsylvania Ave. NW
Washington, D. C. 20229,**

**COMPLAINT FOR
INJUNCTIVE RELIEF**

Defendant.

1. This is an action brought by the plaintiff, Customs & International Trade Newsletter ["Newsletter"] under the Freedom of Information Act ["FOIA"], 5 U.S.C. §552 to enjoin defendant, U. S. Customs and Border Protection ["Customs"] from withholding from public disclosure certain records of Customs within their possession and control.

2. This Court has jurisdiction over this action pursuant to 5 U.S.C. §552(a)(4)(B)

3. Newsletter is a periodic publication of the Peter S. Herrick, P.A. ["Herrick"] law firm.

4. Customs is an agency of the United States.

5. In a letter of January 7, 2007, Herrick, on behalf of Newsletter, pursuant to the FOIA, requested Customs to provide the names and addresses of companies who are the subject of Customs' Beef Hormone Implementation Directive for the period July 1, 2007

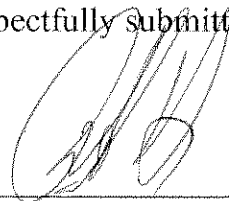
through December 31, 2007..

6. There has been no response to this request.
7. A FOIA appeal for failing to respond to this request was filed with Customs by Herrick on behalf of the Newsletter on February 8, 2007.
8. There has been no response to the FOIA appeal.
9. The 20 day response period and the 20 day appeal period have expired.
10. Newsletter has exhausted its administrative remedies as provided by 5 U.S.C. §552(a)(6)(C)(i).

WHEREFORE, plaintiff respectfully requests the Court:

1. To take jurisdiction of this cause of action;
 2. To order Customs to immediately release the requested records to Herrick;
- and,
3. To grant such other and further relief as the Court may deem proper and just including attorney fees and costs.

Respectfully submitted,



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